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17	THE UNITED STATES DISTRICT COURT			
18	FOR THE NORTHERN DIS	STRICT OF CALIFORNIA		
19	SAN FRANCISCO DIVISION			
20	MEREDITH CALLAHAN and LAWRENCE	Case No. 3:20-cv-09203-EMC		
21	GEOFFREY ABRAHAM, individually and on	IOINT CTIDIII ATIONI AND		
22	behalf of all others similarly situated,	JOINT STIPULATION AND ORDER TO MODIFY DEADLINES FOR		
	Plaintiffs,	MOTION TO STRIKE DEFENDANT'S		
23	,	ANSWER		
24	vs.			
25	DEODI ECONNECT INC. a Dalawara			
	PEOPLECONNECT, INC., a Delaware Corporation,			
26	Corporation,			
27				
	Defendant.			
28				

Pursuant to Local Rules 6-1 and 6-2, Meredith Callahan, Lawrence Geoffrey Abraham ("Plaintiffs"), and PeopleConnect, Inc. ("Defendant," PeopleConnect," or "Classmates"), by and through their undersigned counsel, hereby stipulate to vacate the deadline for Plaintiffs to bring any motion to strike any portion of PeopleConnect's Answer (Dkt. No. 80) and set a deadline for PeopleConnect to file an Amended Answer on or before May 17, 2022. In support of this stipulation, the Parties state as follows:

- 1. On December 1, 2021, PeopleConnect filed an Answer and Affirmative and Additional Defenses. Dkt. No. 80.
- 2. On December 15, 2021, Plaintiffs filed a Motion to Strike Affirmative Defenses. Dkt. No. 85.
- 3. On December 20, 2021, the Court vacated Plaintiffs' Motion to Strike pursuant to the stay entered on the same day. Dkt Nos. 88, 89.
 - 4. On April 11, 2022, the Court lifted the stay. Dkt. No. 96.
- 5. At the Parties' request, the deadline for Plaintiffs to re-file the vacated Motion to Strike was previously extended to April 22, 2022. (Dkt. Nos. 102, 103) to allow the Parties to meet and confer regarding the issues raised in that Motion.
- 6. The Parties have met and conferred and PeopleConnect has advised Plaintiffs' counsel that it intends to amend certain of its affirmative defenses and file an Amended Answer on or before May 17, 2022.
- 7. The Parties therefore respectfully request that this Court modify the case deadlines as follows:
 - a. The deadline for Plaintiffs to re-file a Motion to Strike PeopleConnect's Answer and Affirmative Defenses (Dkt. 80) shall be vacated.
 - b. The deadline for PeopleConnect to file an Amended Answer is May 17, 2022.

By: \(\frac{s}{Raina C. Borrelli} \) Raina Borrelli (\(\text{Pro Hac Vice} \) raina@turkestrauss.com Sam Strauss (\(\text{Pro Hac Vice} \) sam@turkestrauss.com TURKE & STRAUSS LLP 613 Williamson St., Suite 201 Madison, Wisconsin 53703-3515 Telephone: (608) 237-1775 Facsimile: (509) 4423 Michael F. Ram (SBN 104805) mram@forthepeople.com Marie N. Appel (SBN 187483) mappel@forthepeople.com MORGAN & MORGAN MORGAN & MORGAN MORGAN & MORGAN By: \(\frac{s}{Debbie L. Berman} \) Debbie L. Berman (pro hac vice) deberman@jenner.com Wade A. Thomson (pro hac vice) wthomson@jenner.com JENNER & BLOCK LLP State T. Spelman (Cal. Bar. No. 269109) kspelman@jenner.com JENNER & BLOCK LLP State T. Spelman (Cal. Bar. No. 269109) spelman@jenner.com JENNER & BLOCK LLP State T. Spelman (Cal. Bar. No. 269109) State T. Spelman (Cal. Bar. No. 26910	1	Dated: April 22, 2022	
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20 Attorneys for Plaintiffs and the Proposed Classes	20		
21 Classes	21	Ciasses	
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SIGNATURE ATTESTATION			
23	23		
Pursuant to Local Rule 5-1(i), I hereby attest that concurrence in the filing of this			
document has been obtained from each of the other Signatories.			
Dated: April 22, 2022 /s/ Raina C. Borrelli	26	Dated: April 22, 2022 /s/	Raina C. Borrelli
Raina C. Borrelli	20	<u> </u>	
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1	PURSUANT TO STIPULATION, IT IS SO ORDERED		
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4			
5	Dated: <u>April 22, 2022</u>	Edh.	
6		Hon. Edward M. Chen	
7		United States District Court Judge	
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